

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

*In the Matter of*

Connect America Fund – Alaska Plan

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WC Docket No. 16-271

**COMMENTS OF THE ALASKA TELECOM ASSOCIATION  
IN SUPPORT OF THE APPLICATION FOR REVIEW  
OF MAPPING WAIVER DENIAL**

The Alaska Telecom Association (“ATA”) files Comments in support of the Application for Review (“AFR”) filed April 1, 2019 requesting the Commission to reverse the Waiver Denial Order and grant the Waiver Petition regarding accuracy standards for certain elements of networks maps.

Alaska Plan participants have demonstrated in multiple filings the burden of the 7.6 meter standard adopted by the Wireless Telecommunications Bureau and Wireline Competition Bureaus (“Bureaus”).<sup>1</sup> They have already filed extensive network maps using the Bureaus’ interim standard of 50 meters.<sup>2</sup> These network maps provide all the information requested by the Bureaus regarding links and nodes of Alaska’s middle mile networks to within a 50 meter accuracy standard. Applying the 7.6 meter standard imposes tremendous additional burden on Alaska Plan companies, burden which will not increase the utility of the maps.

The networks maps which have already been provided and which will continue to be updated are sufficient to allow the Bureaus to perform their duties under the Alaska Plan Order to, “assess whether local conditions have changed, and any adjustments to the performance plan might be appropriate.”<sup>3</sup> In fact, these maps are the most complete, current maps of Alaska’s telecommunications infrastructure in existence. Despite repeated inquiries, ATA has been unable to discover what further purpose would require accuracy

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<sup>1</sup> See *Comments of Alaska Telephone Association on Proposed Information Collection Requirements* filed in WC-Docket 16-271 October 10, 2017, *Petition for Reconsideration* filed in WC-Docket 16-271 October 10, 2017, and *Comments of Alaska Telephone Association* filed with The Office of Management and Budget January 11, 2018.

<sup>2</sup> See *Order on Reconsideration*, WC Docket 16-271, adopted February 28, 2018 allowing carriers to submit estimated data within 50 meters of accuracy.

<sup>3</sup> See *Report and Order and Further Notice of Proposed Rulemaking*, adopted August 31, 2016, “Alaska Plan Order” paragraph 61.

beyond the 50 meters standard used for the first filings of these maps, or what deficiencies in the maps submitted require a more demanding accuracy standard. Requiring accuracy to be increased will divert scarce funding away from operating and expanding broadband networks, without providing additional information necessary for the Bureaus to perform their oversight of performance obligations.

ATA and its members remain committed to the consensus plan adopted in the Alaska Plan Order, “to maintain, extend, and upgrade broadband service across all areas of Alaska served by rate-of-return carriers and their wireless affiliates.”<sup>4</sup> Alaska Plan participants are on-track to meet all performance obligations of the Plan and are reporting that progress through the High Cost Universal Broadband portal and to the Bureaus. They are committed to compliance with accountability requirements and are eager to demonstrate the powerful benefits Alaska Plan funding is bringing to Alaskans. However, the excessive burden imposed by the 7.6-meter standard is an impediment to those efforts and an unnecessary diversion of immense resources away from broadband service. We respectfully urge the Commission to reverse the Waiver Denial Order and grant the Waiver Petition.

Respectfully submitted,

*Via ECFS 04/16/2019*

Christine O'Connor  
Executive Director

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<sup>4</sup> Ibid, paragraph 1.

## **CERTIFICATE OF SERVICE**

I, Christine O'Connor, hereby certify that on this 16<sup>th</sup> day of April, 2019, I caused a true and correct copy of the foregoing Comments of the Alaska Telecom Association to be served by electronic mail upon:

Julie A. Veach  
Counsel to GCI Communication Corp.  
Harris, Wiltshire & Grannis LLP  
1919 M Street NW, 8<sup>th</sup> Floor  
Washington, D.C. 20036  
jveach@hwglaw.com

/s/\_\_\_\_\_  
Christine O'Connor  
Executive Director  
Alaska Telecom Association  
201 East 56<sup>th</sup> Avenue  
Suite 114  
Anchorage, AK 99518  
oconnor@alaskatel.org